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Direct Dial: (212) 894-6780
Direct Fax: (212) 370-4453
dharrington@condonlaw.com

December 22, 2021

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DATE FILED: 12/27/2021

FILED VIA ECF

Hon. Andrew L. Carter, Jr., United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007

MEMO ENDORSED

Subject: Request for Extension of Time to Re-File Motion for Default Judgment
Case Name: Virgin Australia Regional Airlines, Pty Ltd. v. JetPro
International, LLC
Case Number: 1:20-cv-06737-ALC
Filer: Virgin Australia Regional Airlines, Pty Ltd.

Dear Judge Carter:

On behalf of Virgin Australia Regional Airlines, Inc. ("VARA"), we respectfully request an extension to re-file VARA's Motion for Default Judgment. Your Honor rendered a decision on November 30, 2021 [D.E. 17] denying VARA's Motion for Default Judgment [D.E. 14] and instructing VARA to clarify four (4) issues raised by the Court and re-file the Motion by December 30, 2021. The motion was unopposed, and Defendant has yet to make an appearance in this action.

We have recently dealt with a number of positive COVID-19 cases at our firm, and the attorney handling this motion was recently notified of a direct exposure involving his family. Given the uncertainties relating to this recent exposure and the current logistical challenges of testing for COVID-19 in New York City due to the uptick in the new variant, this will undoubtedly have an impact on working conditions. Accordingly, we respectfully request a two-week extension of the deadline to re-file VARA's Motion for Default Judgment until January 13, 2022 to allow for time to handle any COVID-related issues that may create challenges in complying with the December 30 deadline.

Thank you for your consideration.

Respectfully,

A handwritten signature in blue ink, appearing to read "D. Harrington", with a stylized flourish at the end.

David J. Harrington
Condon & Forsyth LLP

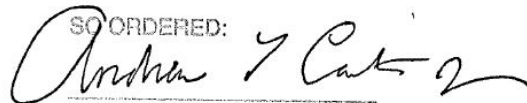


The Honorable Andrew L. Carter, Jr.
December 22, 2021
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Attorneys for Virgin Australia Regional Airlines, Pty Ltd.

Cc (by e-mail): Kyle Wine
JetPro International, LLC

Application GRANTED. Plaintiff shall file its renewed motion no later than **January 13, 2022**. Defendant shall oppose no later than **February 14, 2022**. Plaintiff shall serve a copy of this Order on Defendant and file proof of service by **December 29, 2021**.

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: 12/27/2021